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10 *[Additional Counsel Listed on Next Page]*

11 UNITED STATES DISTRICT COURT
12 NORTHERN DISTRICT OF CALIFORNIA

13 KESHAV BHATTARAI; SAJJAN PANDEY;
14 SUMNIMA THAPA; DONALDO POSADAS
CACERES; SORAYDA RODRIGUEZ
15 MOTIÑO; DENIS MOLINA CHAVEZ; S.S.,
individually and on behalf of others similarly
16 situated; and G.D.P., individually and on
behalf of others similarly situated,

17 *Plaintiffs,*

18 v.

19 KIRSTJEN NIELSEN, in her official capacity
as Secretary of Homeland Security; ELAINE
20 C.DUKE, in her official capacity as Deputy
Secretary of Homeland Security; UNITED
21 STATES DEPARTMENT OF HOMELAND
SECURITY; and UNITED STATE OF
22 AMERICA

23 *Defendants.*

Case No. 3:19-cv-00731-EMC

NOTICE OF WITHDRAWAL OF COUNSEL

The Honorable Edward M. Chen

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1 PLEASE TAKE NOTICE that, pursuant to Civil Local Rule 11-5(a) and subject to the Court's
2 permission, Zoe McKinney is withdrawing as counsel for Petitioner. Zoe McKinney is withdrawing as
3 counsel for Plaintiffs because she is leaving the American Civil Liberties Union Foundation of
4 Southern California. Notice of Ms. McKinney's intent to withdraw has been provided to counsel for
5 Plaintiffs and counsel for Defendants. The above-listed counsel will continue to serve as counsel of
6 record for Plaintiffs.

7
8 Dated: August 15, 2022

9 AMERICAN CIVIL LIBERTIES
10 UNION FOUNDATION OF
11 SOUTHERN CALIFORNIA

12 By: /s/ Zoe McKinney

13 Zoe McKinney
14 *Attorney for Plaintiffs*
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17 *Plaintiffs,*

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23 STATES DEPARTMENT OF HOMELAND
24 SECURITY; and UNITED STATE OF
25 AMERICA

26 *Defendants.*

Case No. 3:19-cv-00731-EMC

[PROPOSED] ORDER

The Honorable Edward M. Chen

1 Zoe McKinney seeks to withdraw as counsel for Plaintiffs in the above-captioned
2 litigation pursuant to Civil Local Rule 11-5(a). As this Court finds Ms. McKinney has submitted
3 satisfactory reasoning for withdrawal and that permitting his withdrawal will not cause substantial
4 prejudice or delay to any party, IT IS HEREBY ORDERED that Zoe McKinney is relieved as
5 counsel for Plaintiffs in this proceeding.

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7 Date: _____

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9 The Honorable Edward M. Chen
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